

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE

Case  
03-CA-291395Date Filed  
3/1/2022**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Tel. No. 208-318-2212
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134	e. Employer Representative Kevin Johnson, President and CEO	g. e-mail kevin.johnson@starbucks.com
3540 McKinley Parkway, Blasdell, NY 14219	(See attached for District Managers)	h. Number of workers employed 30
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  
See attached

3. Full name of party filing charge (if labor organization, give full name, including local name and number)  
Workers United

4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Tel. No. 585-473-3280
	4c. Cell No.
	4d. Fax No.
	(b) (6), (b) (7)(C)

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)  
Workers United, a/w SEIU

## 6. DECLARATION

I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.

Ian Hayes, Attorney

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Tel. No.  
716-608-3427

Office, if any, Cell No.

Fax No.

e-mail  
ihayes@hayesdolce.comHayes Dolce  
Address 471 Voorhees Ave., Buffalo, NY 14216

Date Feb 28, 2022

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

## **Attachment to Charge Against Employer**

### **Section 1.e - Employer Representative**

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)@starbucks.com

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)@starbucks.com

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)@starbucks.com

### **Section 2 – Basis of Charge**

In the past six months, the above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including:

- Beginning in about December 2021 and continuing to present, by temporarily closing the McKinley Parkway store for renovations, providing a benefit to employees to discourage union activity; and
- Beginning in about December 2021 and continuing to present, by temporarily closing the McKinley Parkway store for renovations, thereby reducing employees' compensation during the closure.

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.